RICHARD A. HARRIS, ESQ. 1 Nevada State Bar No. 505 2 JOSHUA R. HARRIS, ESQ. Nevada State Bar No. 9580 3 RICHARD HARRIS LAW FIRM 801 S FOURTH ST. 4 LAS VEGAS NV 89101 5 Ph: (702) 444-4392 Fax: (702) 444-4455 6 Email: josh@richardharrislaw.com **Attorney for Plaintiff** 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 MICHELLE M. NAULT, Case No 2:19-cy-00038-GMN-BNW 12 Plaintiff, 13 MOTION FOR SECOND EXTENSION OF TIME TO FILE VS. 14 MOTION FOR REMAND COMMISSIONER OF SOCIAL 15 SECURITY ADMINISTRATION, 16 Defendant. 17 18 Comes now Plaintiff, by and through her attorney, JOSHUA R. HARRIS, ESQ., and 19 requests a SEVEN day (7) calendar day extension of time, to file the **MOTION TO FOR** 20 **REMAND,** up to and including June 10, 2019. 21 Plaintiff's current deadline to file the **MOTION FOR REMAND** is June 3, 2019. 22 The Appellate Attorney Writer's brief writing calendar has been overloaded and we 23 graciously would appreciate this small extension. 24 25 We were not able to timely communicate with opposing counsel, but opposing counsel has typically never had an objection to a request for an extension. 26 27 28

| 1 | It is therefore respectfully requested that Plaintiff be granted a SEVEN day (7) calendar |
|------|---|
| 2 | extension of time to file the MOTION FOR REMAND up to and including June 10, 2019. |
| 3 | |
| 4 | DATED this 2 nd day of May, 2019. |
| 5 | /s/ Joshua R. Harrís |
| 6 | JOSHUA HARRIS, ESQ. |
| 7 | Nevada State Bar No. 9580 |
| 8 | Richard Harris Law Firm 801 S Fourth St. |
| o | Las Vegas NV 89101 |
| 9 | Ph: (702) 444-4392 |
| 10 | Fax: (702) 444-4455 Email: josh@richardharrislaw.com |
| 11 | Attorney for Plaintiff |
| 12 | |
| | I, NOEL S. ANSCHUTZ, hereby certify that I caused a copy of MOTION FOR SECOND |
| 13 | EXTENSION OF TIME TO FILE MOTION FOR REMAND |
| 14 | to be serviced, via CM/ECF notification, on: |
| 15 | Michael K. Marriott |
| 16 | Assistant Regional Counsel |
| 1 17 | Social Security Administration |
| 17 | Office of the General Counsel, Region IX 160 Spear Street, Suite 800 |
| 18 | San Francisco, CA 94105 |
| 19 | Telephone: 415-977-8985 |
| 20 | Facsimile: 415-744-0134 Email: Michael.Marriott@ssa.gov |
| 21 | Attorney for Defendant |
| 22 | |
| 23 | The court having received defendant's Non- |
| | Opposition hereto (ECF No. 19), |
| 24 | IT IS SO ORDERED: |
| 25 | |
| 26 | A lovere |
| 27 | UNITED STATES MAGISTRATE JUDGE |
| 28 | DATED: _June 6, 2019 |